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Proposed Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

BLOCKFI INC., et al.,

Debtors. 1

Case No. 22-19361 (MBK)

(Jointly Administered)

NOTICE OF ADJOURNMENT OF CERTAIN MATTERS SCHEDULED FOR HEARING ON JANUARY 9, 2023

PLEASE TAKE NOTICE that the following matters will go forward at the hearing scheduled for January 9, 2023 at 10:00 a.m. (ET):

- 1. *Notice of Chapter 11 Status Conference Hearing* [Docket No. 47];
- 2. Motion of George J. Gerro for Entry of an Order (I) Granting Partial Relief From the Automatic Stay (11 U.S.C. § 362(d)(1)) and Discharge Injunction (11 U.S.C. §524(a)) With Respect to Certain Non-Core Proceedings; and (II) Extending Time to File a Proof of Claim (F.R.B.P. 3003(c)(3)) [Docket No. 117]; and
- 3. Debtors' Motion for Entry of an Order Pursuant to Sections 105(a), 542, and 543

The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

of the Bankruptcy Code (I) Directing the Collateral be Transferred to a Neutral Broker or Escrow Under the Court's Supervision of (II) Enjoining the Defendants from Transferring or Using the Collateral Pending Final Resolution of the Turnover Claims [Adv. Proceeding 22-01382, Docket No. 2].

PLEASE TAKE FURTHER NOTICE that the following matters originally scheduled for hearing on January 9, 2023 at 10:00 a.m. (ET) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, have been adjourned to <u>Tuesday, January 17, 2023 at 10:00 a.m. (ET)</u> (the "<u>Adjourned Hearing</u>") or as soon thereafter as counsel may be heard:

- 1. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders and (V) Granting Related Relief [Docket No. 4] (final hearing);
- 2. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Use of Existing Business Forms and Records, (B) Maintain Existing Corporate Bank Accounts and Cash Management System, (C) Pay Prepetition Bank Fees Associated with the Cash Management System, and (D) Continue Performance of Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Waiving Certain U.S. Trustee Requirements [Docket No. 7] (final hearing);
- 3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Taxes and Fees and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers Pursuant to Bankruptcy Code §§ 105(a), 363(b), 507(a)(8), and 541(d) [Docket No. 9] (final hearing);
- 4. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. \$\xi\$ 105(a) and 366 (I) Prohibiting Utility Companies from Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment [Docket No. 10] (final hearing);
- 5. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 363(c) Authorizing the Debtors to (I) Continue, Renew, or Supplement Insurance Policies, (II) Pay Insurance Premiums and Related Obligations Thereon, (III) Continue, Renew, or Supplement the Surety Bond Program, and (IV) Granting Related Relief [Docket No. 11] (final hearing);
- 6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Claimants and (II) Granting Related Relief [Docket No. 13] (final hearing);

- 7. Debtors' Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [Docket No. 14] (final hearing);
- 8. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 16] (final hearing);
- 9. Debtors' Motion for Entry of an Order (I) Approving the Debtors' Retention Programs and (II) Granting Related Relief [Docket No. 21];
- 10. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor Withdrawals From Wallet Accounts, (B) Update the User Interface to Properly Reflect Transactions and Assets as of the Platform Pause, and (C) Conduct Ordinary Course Reconciliation of Accounts, and (II) Granting Related Relief [Docket No. 121];
- 11. Debtors' Motion for Entry of an Order Authorizing and Approving Procedures for Rejection of Executory Contracts and Unexpired Leases [Docket No. 122];
- 12. Debtors' Motion for Entry of an Administrative Fee Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court [Docket No. 123];
- 13. Debtors' Motion for Entry of an Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. 124];
- 14. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Continue Servicing and Administration Activities in the Ordinary Course of Business with Respect to the Debtors' Institutional Loan Portfolio and Granting Related Relief and (II) Authorizing and Establishing Procedures Regarding the Restructuring, Settlement, or Other Modifications of Institutional Loans and Loan Obligations [Docket No. 125]; and
- 15. Debtors' Motion for Entry of an Order Authorizing the Debtors to File Under Seal the Names of Certain Confidential Transaction Parties in Interest Related to the Debtors' Professional Retention Applications [Docket No. 127].

PLEASE TAKE FURTHER NOTICE that the objection deadline for the matters to be considered at the Adjourned Hearing has been extended to Tuesday, January 10, 2023 only as to the United States Trustee and the Official Committee of Unsecured Creditors.

PLEASE TAKE FURTHER NOTICE that to the extent that any objections are filed to the following professional retention applications (the "<u>Retention Applications</u>"), those matters will be heard at the Adjourned Hearing:

- 1. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Attorneys for the Debtors and Debtors in Possession Effective as of November 28, 2022 [Docket No. 133];
- 2. Debtors' Application for Entry of an Order Under 11 U.S.C. §§ 327(a), 330 and 1107(b) Authorizing the Employment and Retention of Haynes and Boone, LLP as Bankruptcy Co-Counsel for the Debtors and Debtors in Possession Effective as of the Petition Date Pursuant to Local Bankruptcy Rule 2014-1 [Docket No. 134];
- 3. Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Cole Schotz P.C. as New Jersey Counsel to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 135];
- 4. Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Administrative Advisor Nunc Pro Tunc to the Petition Date [Docket No. 136];
- 5. Application of the Debtors and Debtors in Possession for Entry of an Order Authorizing the Retention and Employment of Moelis & Company LLC as Investment Banker, Capital Markets Advisor, and Financial Advisor Effective as of the Petition Date [Docket No. 139]; and
- 6. Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Berkeley Research Group, LLC as Financial Advisors to the Debtors, Effective as of the Petition Date Through the CRO Appointment Date, and (II) Authorizing Berkeley Research Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel, Effective as of the CRO Appointment Date [Docket No. 174].

PLEASE TAKE FURTHER NOTICE that the objection deadline for the Retention Applications has been extended to January 10, 2023 only as to the United States Trustee and the Official Committee of Unsecured Creditors.

PLEASE TAKE FURTHER NOTICE that any parties wishing to participate in the Adjourned Hearing via Zoom for Government must consult Judge Kaplan's website, http://www.njb.uscourts.gov/BlockFi, for instructions on how to attend this hearing.

Respectfully Submitted,

Dated: January 4, 2023

/s/ Michael D. Sirota

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